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 Counsel for Defendant BUILD OUR CENTER

UNITED STATES DISTRICT COURT  
 [NORTHERN] DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY, NEVADA; WASHOE  
 COUNTY LIBRARY SYSTEM; BUILD OUR  
 CENTER, INC.; JEFF SCOTT; STACY  
 MCKENZIE; JONNICA BOWEN; LIBRARY  
 EMPLOYEE DOE # 1; JENNIFER COLE;  
 DEPUTY C. ROTHKIN (Badge No. 4696);  
 DEPUTY R. SAPIDA (Badge No. 4663);  
 SGT. GEORGE GOMEZ (Badge No. 4066);  
 and JOHN/JANE DOES 1-10;

Defendants.

**DEFENDANT  
 BUILD OUR CENTER'S  
 LIMITED OPPOSITION TO  
 PLAINTIFF'S MOTION FOR LEAVE  
 TO FILE SUPPLEMENTAL BRIEF  
 IN OPPOSITION TO DEFENDANT  
 BUILD OUR CENTER, INC.'S  
 MOTION TO DISMISS**

Defendant BUILD OUR CENTER INC., by and through its undersigned counsel, hereby files its limited opposition to *Plaintiff's Motion for Leave to File Supplemental Brief in Opposition to Defendant Build Our Center, Inc.'s Motion to Dismiss* filed herein on January 21, 2025 [ECF 54].

This limited opposition is made and based upon all the pleadings and records on file herein and the Points and Authorities set forth directly hereinbelow.

**POINTS AND AUTHORITIES**

Plaintiff seeks leave to file a supplemental brief so that he may present additional evidence and arguments. However, as set forth in *Defendant Build Our Center's Reply in Support of Motion to Dismiss* (the "Reply") filed herein on January 9, 2025 [ECF 47], which is incorporated by reference herein, such

1 additional evidence or arguments should not be considered by the Court in  
 2 determining Build Our Center's *Motion to Dismiss*; the additional matters and  
 3 evidence presented by Mr. Ribar are outside of the present motion and pleadings.

4 Build Our Center respectfully requests the Court not consider Mr. Ribar's  
 5 additional evidence, nor should it convert the *Motion to Dismiss* to a motion for  
 6 summary judgment. Build Our Center's *Motion to Dismiss* is a facial attack of  
 7 Mr. Ribar's Complaint. Mr. Ribar's Complaint as to Build Our Center is fatally  
 8 flawed and granting him leave to file a sur-reply is futile. Mr. Ribar has not and  
 9 will not be able to set forth factual allegations to support a cognizable legal theory  
 10 under which Build Our Center could be found liable for any wrongdoing or  
 11 damage as to Mr. Ribar.

### 12 **CONCLUSION**

13 Therefore, the Court should deny *Plaintiff's Motion for Leave to File*  
 14 *Supplemental Brief in Opposition to Defendant Build Our Center, Inc.'s Motion to*  
 15 *Dismiss*. Likewise, the Court should grant Build Our Center's Motion to Dismiss.

16 DATED February 4, 2025.

17 SIERRA CREST BUSINESS LAW GROUP

18  
 19 By:



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 25 CENTER  
 26  
 27  
 28

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system (which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

**Drew Ribar**

480 Pershing Lane, Washoe Valley, NV 89704  
(775) 223-7899  
const2audit@gmail.com  
*Plaintiff in propria persona*

**Michael W. Large, Esq.**

DEPUTY DISTRICT ATTORNEY  
One South Sierra Street Reno, NV 89501  
mlarge@da.washoecounty.gov  
(775) 337-5700  
*Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez*

DATED: February 4, 2025.

/s/ Mayra Ibarra

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an employee of the  
SIERRA CREST BUSINESS LAW GROUP

## INDEX OF EXHIBITS

to

DEFENDANT BUILD OUR CENTER'S LIMITED OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF IN OPPOSITION TO  
DEFENDANT BUILD OUR CENTER, INC.'S MOTION TO DISMISS

re

*Ribar vs. Washoe County, et alia*  
(Case No. 3:24-cv-00526)

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